

FORM A

CIVIL RIGHTS COMPLAINT TO BE USED BY A *PRO SE* PRISONER

UNDER 42 U.S.C. § 1983 or

Rev. 10/10

UNDER *BIVENS V. SIX UNKNOWN FED. NARCOTICS AGENTS*

FILED

JAMES J. VILT, JR. - CLERK

APR 07 2021

U.S. DISTRICT COURT
WEST'N. DIST. KENTUCKY

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF KENTUCKY

Ramon Leis III

(Full name of the Plaintiff(s) in this action)

v.

CIVIL ACTION NO. 1:21-cv-54-GNS
(To be supplied by the clerk)

Alcohol, Tobacco & Firearm Agency

Agent Chris McClellan

Special Agent Dean Clark

Clarksville Police Department

Officer Casey Stanton

(Full name of the Defendant(s) in this action)

☒ DEMAND FOR JURY TRIAL

☐ NO JURY TRIAL DEMAND
(Check only one)

I. PARTIES

(A) **Plaintiff(s).** Place the full name of the Plaintiff in the first blank below, his/her place of confinement, address, and status. Repeat this procedure for each additional Plaintiff named, if any.

(1) Name of Plaintiff: Ramon Leis

Place of Confinement: Warren County Regional Jail

Address: 920 Kentucky St. Bowling Green, Ky. 42101

Status of Plaintiff: CONVICTED ☐ PRETRIAL DETAINEE ☒

(2) Name of Plaintiff: _____

Place of Confinement: _____

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UNITED STATES DISTRICT COURT WESTERN DISTRICT OF KENTUCKY

Ramon Leis III

(Full name of the Plaintiff(s) in this action)

v.

CIVIL ACTION NO. _____
(To be supplied by the clerk)

Tennessee Bureau of Investigation

Cheatham County Sheriff's Office

☒ DEMAND FOR JURY TRIAL

☐ NO JURY TRIAL DEMAND
(Check only one)

(Full name of the Defendant(s) in this action)

I. PARTIES

(A) **Plaintiff(s).** Place the full name of the Plaintiff in the first blank below, his/her place of confinement, address, and status. Repeat this procedure for each additional Plaintiff named, if any.

(1) Name of Plaintiff: _____

Place of Confinement: _____

Address: _____

Status of Plaintiff: CONVICTED ☐ PRETRIAL DETAINEE ☐

(2) Name of Plaintiff: _____

Place of Confinement: _____

Address: _____

Status of Plaintiff: CONVICTED () PRETRIAL DETAINEE ()

(3) Name of Plaintiff: _____

Place of Confinement: _____

Address: _____

Status of Plaintiff: CONVICTED () PRETRIAL DETAINEE ()

(B) Defendant(s). Place the full name of the Defendant in the first blank below, his/her official position title in the second blank, and his/her place of employment in the third blank. Mark the capacity in which the Defendant is being sued. Repeat this procedure for each additional Defendant named, if any.

(1) Defendant Alcohol, Tobacco & Firearms Agency is employed
as _____ at _____.

The Defendant is being sued in his/her () individual and/or (☒) official capacity.

(2) Defendant Chris McClellan is employed
as Agent at Alcohol, Tobacco & Firearms Agency.

The Defendant is being sued in his/her () individual and/or (☒) official capacity.

(3) Defendant Dean Clark is employed
as Special Agent at Alcohol, Tobacco & Firearms Agency.

The Defendant is being sued in his/her () individual and/or (☒) official capacity.

(4) Defendant Clarksville Police Department is employed
as _____ at _____.

The Defendant is being sued in his/her () individual and/or () official capacity.

(5) Defendant Casey Stanton is employed
as Officer at Clarksville Police Department.

The Defendant is being sued in his/her () individual and/or (☒) official capacity.

II. PREVIOUS LAWSUITS

(A) Have you begun other lawsuits in State or Federal court dealing with the same facts involved in this action? YES () NO (☒)

(B) If your answer to "A" is YES, describe the lawsuit in the spaces below. If there is more than one lawsuit, you must describe the additional lawsuits on another sheet of paper, using the same outline.

Parties to the previous lawsuit:

Plaintiff(s): _____

Defendant(s): _____

Court (if federal court, name the district. If state court, name the county):

Docket number: _____

Name of judge to whom the case was assigned: _____

Type of case (for example, habeas corpus or civil rights action): _____

Disposition (for example, Was the case dismissed? Is it still pending? Is it on appeal?):

Approximate date of filing lawsuit: _____

Approximate date of disposition: _____

Address: _____

Status of Plaintiff: CONVICTED () PRETRIAL DETAINEE ()

(3) Name of Plaintiff: _____

Place of Confinement: _____

Address: _____

Status of Plaintiff: CONVICTED () PRETRIAL DETAINEE ()

(B) Defendant(s). Place the full name of the Defendant in the first blank below, his/her official position title in the second blank, and his/her place of employment in the third blank. Mark the capacity in which the Defendant is being sued. Repeat this procedure for each additional Defendant named, if any.

(1) Defendant Tennessee Bureau of Investigation is employed
as _____ at _____.

The Defendant is being sued in his/her () individual and/or (☒) official capacity.

(2) Defendant Cheatham County Sheriff's Office is employed
as _____ at _____.

The Defendant is being sued in his/her () individual and/or (☒) official capacity.

(3) Defendant _____ is employed
as _____ at _____.

The Defendant is being sued in his/her () individual and/or () official capacity.

(4) Defendant _____ is employed
as _____ at _____.

The Defendant is being sued in his/her () individual and/or () official capacity.

III. STATEMENT OF CLAIM(S)

State here the FACTS of your case. State how you believe your constitutional rights were violated. Describe how each Defendant violated your rights. And set forth the dates on which each event took place. Do not make legal arguments or cite cases or statutes. However, identify the constitutional right(s) you allege was/were violated. If you intend to assert multiple claims, number and set forth each claim in separate paragraphs.

On Feb. 24, 2021 I was at the Dollar General Store located at 7605 US-41A - Cedar Hill, TN. talking to a friend. While at the Dollar General Store 2 unknown vehicles blocked my friends vehicle and jumped out with guns. None of them announced themselves as law enforcement so out of fear for my life I jumped out of the passenger side of my friends Jeep and ran out of fear for my life. At that time I was struck by a SUV, knocking me out. I was revived by paramedics using smelling salts and then transported by ambulance to the hospital in Ashland City, TN. I later learned the SUV was driven by ATF. On my seizure paperwork ATF Agent Chris McClellan listed my race as "Hispanic", not once but twice. There are also discrepancies on my seizure paperwork. My mother is white and my father is from Venezuela. So I feel like I was racially profiled and attacked. I am filing this lawsuit due to the fact that the ATF, Clarksville Police Department, Tennessee Bureau of Investigation and Cheatham County Sheriff's Department can not get their statements

III. STATEMENT OF CLAIM(S) continued

on track. None of the statements match up. ATF Special Agent Dean Clark stated things against me that are nothing more than hear-say as there is no evidence to back up his statements. Special Agent Shawn Adkin of Tennessee Bureau of Investigation got a search warrant for a residence to look for evidence against me for which I did not live at the said residence. I feel like due to my criminal background the law enforcement is profiling me and trying everything they can to incarcerate me of false charges

IV. RELIEF

State exactly what you want the Court to do for you. (If you seek relief which affects the fact or duration of your imprisonment (for example: release from illegal detention, restoration of good time, expungement of records, release on parole), you must also file your claim under 28 U.S.C. §§ 2241, 2254 or 2255.) The Plaintiff(s) want(s) the Court to:

☒ award money damages in the amount of \$ 10,000,000⁰⁰

☐ grant injunctive relief by _____

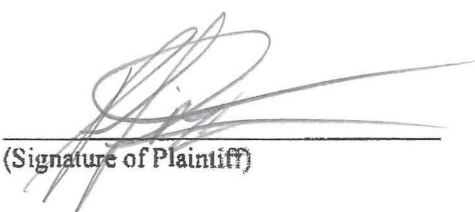
☐ award punitive damages in the amount of \$ _____

☒ other: The corrupt law enforcement officers be fired from job

V. DECLARATION UNDER PENALTY OF PERJURY
(each Plaintiff must sign for him/herself)

I, the undersigned, declare under penalty of perjury that the information contained in this document is true and correct.

This ____ day of _____, 20__.



(Signature of Plaintiff)

(Signature of additional Plaintiff)

(Signature of additional Plaintiff)

I hereby certify that a copy of this complaint was delivered to the prisoner mail system for mailing on _____.

(Signature)